

Date 25 August 2026
Your Ref
Our Ref 11767

Enquiries to Richard Mutch
Extension 35687
Direct Line 0131 465 5687
loth.freedomofinformation@nhs.scot
richard.mutch@nhs.scot

Dear

FREEDOM OF INFORMATION – NON-SURGICAL COSMETIC PROCEDURES

I write in response to your request for information in relation to complications arising from non-surgical cosmetic procedures.

Question:

Please provide recorded information held by the Board concerning complications arising from non-surgical cosmetic procedures and the development of Scottish legislation regulating those procedures.

For this request, “independent aesthetic practitioner” means a person who personally performs non-surgical aesthetic procedures and who is not registered as a doctor, dentist, nurse, midwife, pharmacist or another statutory healthcare professional.

For the period 1 January 2023 to the date of this request, please provide:

1. Copies of correspondence, briefings, reports, presentations, meeting records or advice exchanged with the Scottish Government, Healthcare Improvement Scotland, Public Health Scotland or another body concerning:
 - a. the safety or regulation of non-surgical cosmetic procedures;
 - b. restrictions upon which practitioners may perform specified procedures;
 - c. requirements to operate from HIS-registered premises;
 - d. the presence of an authorised prescriber or healthcare professional; and
 - e. procedure classification or risk categorisation.
2. The number of attendances, referrals or admissions recorded by the Board following complications or suspected complications from non-surgical cosmetic procedures, broken down where recorded by:
 - a. financial or calendar year;
 - b. procedure;
 - c. type of complication;
 - d. hospital, service or department;
 - e. whether treatment was provided in Scotland; and
 - f. whether the original procedure was performed in an NHS or private setting.

3. For the records counted under point 2, the number attributed to procedures performed by:
 - a. independent aesthetic practitioners;
 - b. doctors;
 - c. dentists;
 - d. nurses or midwives;
 - e. pharmacists;
 - f. other statutory healthcare professionals;
 - g. practitioners whose professional status was not recorded; and
 - h. practitioners whose identity or status could not be verified.

Aggregate figures are requested. No information identifying clients or individual practitioners is required.

4. Copies of any coding guidance, data definitions, collection instructions or methodology used to identify:
 - a. a non-surgical cosmetic procedure;
 - b. a complication arising from such a procedure;
 - c. the procedure performed;
 - d. the setting in which it was performed; and
 - e. the professional or registration status of the person who performed it.
5. Copies of any analysis, audit, research, literature review or internal report comparing complication rates or outcomes between different practitioner or professional groups.
6. Copies of any complication, injury, infection, referral or admission data supplied by the Board to the Scottish Government, HIS, Public Health Scotland, a parliamentary committee, an advisory group or another body for the purpose of developing or supporting the proposed legislation.
7. Copies of requests received by the Board for evidence, data or professional advice concerning the Scottish Government consultation, the relevant Bill, procedure groupings, practitioner restrictions, premises requirements or proposed secondary legislation.
8. Copies of any evidence, advice, recommendations or concerns submitted in response to the requests identified under point 7.
9. Copies of records identifying NHS Board employees or representatives who attended or contributed to any government advisory group, expert group, workshop or meeting concerning the regulation of non-surgical cosmetic procedures. Please provide their job titles, the body or meeting attended and the dates of participation.
10. Copies of any assessment of the expected effect of the legislation upon NHS services, including:

- a. changes in the number or severity of complications presented to the NHS;
 - b. displacement of procedures into informal or unregulated settings;
 - c. increased demand for corrective treatment;
 - d. reduced reporting of complications;
 - e. treatment availability in rural or island areas; and
 - f. additional costs or staffing requirements for the Board.
11. Copies of records received concerning the number or participation of practising independent aesthetic practitioners directly involved in developing the regulatory proposals, excluding people who only submitted an open public consultation response.
12. Copies of records concerning the role, status, authority or representative standing of:
- a. the Joint Council for Cosmetic Practitioners;
 - b. Save Face Limited;
 - c. the Scottish Medical Aesthetics Safety Group;
 - d. BABTAC; and
 - e. the British Beauty Council.
13. Copies of any correspondence or meeting records between the Board and an organisation listed in point 12 concerning non-surgical cosmetic procedures, practitioner competence, complication reporting, referrals, public guidance or Scottish regulation.

Answer:

Analytical Services are unable to provide an answer for this request as there is no diagnosis or treatment coding that allows us to specify complications following non-surgical cosmetic procedures, and therefore providing the information would require a search of individual patient records. The requested information is not held in a centrally extractable format.

Under the Freedom of Information Act NHS Lothian is not required to create new records to enable it to respond to your enquiry. This information is not collated or held in aggregate form and it would be necessary to review all case files relating to patients over the period you have requested to assemble the information you seek. Even if NHS Lothian did this – and there would be significant cost implications in doing so – it would be unable to respond in full to your request. The information requested is therefore exempt under section 12.1 – Cost.

The Plastic Surgery Department does not carry out any non-surgical aesthetic procedures. Nor are they aware or keep a note of any complications from patients having had this carried out by a non-medical practitioner.

As per Section 17 of the Freedom of Information (Scotland) Act 2002 formally I must advise that we do not hold the requested information.

I am further advised that it might be more appropriate for you to contact the Scottish Government Health Department, Health Improvement Scotland and Public Health Scotland, as they might be the best source for this information.

I am sorry I cannot help further with your request.

If you are unhappy with our response to your request, you do have the right to request us to review it. Your request should be made within 40 working days of receipt of this letter, and we will reply within 20 working days of receipt. If our decision is unchanged following a review and you remain dissatisfied with this, you then have the right to make a formal complaint to the Scottish Information Commissioner within 6 months of receipt of our review response. You can do this by using the Scottish Information Commissioner's Office online appeals service at www.itspublicknowledge.info/Appeal. If you remain dissatisfied with the Commissioner's response you then have the option to appeal to the Court of Session on a point of law.

If you require a review of our decision to be carried out, please write to the FOI Reviewer at the email address at the head of this letter. The review will be undertaken by a Reviewer who was not involved in the original decision-making process.

FOI responses (subject to redaction of personal information) may appear on NHS Lothian's Freedom of Information website at: <https://org.nhsllothian.scot/FOI/Pages/default.aspx>

Yours sincerely

ALISON MACDONALD
Executive Director, Nursing
Cc: Chief Executive